IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA

ALFA LIFE INSURANCE CORPORATION,)
Plaintiff,))
v.) Case No. CV-05-775-C
ADVANTAGE CONSULTING GROUP, INC., and RICHARD E. KNUTSON,)))
Defendants.)
ADVANTAGE CONSULTING GROUP, INC.,)
Third-party Plaintff,))
v.))
EDS SOLCORP,))
Third-party Defendant	<i>)</i>)

JOINT MOTION TO INDEFINITELY SUSPEND DEADLINE FOR FACE-TO-FACE SETTLEMENT DISCUSSIONS

All parties to this action hereby jointly move this Court to indefinitely suspend the deadline for face-to-face settlement discussions. As grounds for this motion, the parties jointly state as follows:

- 1. The Court's August 31, 2006 Order set October 31, 2006 as the deadline for the parties to conduct face-to-face settlement discussions.
- 2. Pursuant to a November 1, 2006, Order (Doc. 60) granting the parties Joint Motion To Extend Deadline for Face-to-Face Settlement Discussions (Doc. 59), the deadline was extended to December 15, 2006.
 - As the parties reported to the Court previously, discovery efforts are ongoing and 3.

are proceeding with a spirit of cooperation among respective counsel for the parties. Counsel for all parties have discussed the issue of settlement but have mutually agreed that meaningful discussions will not be possible until more discovery takes place.

WHEREFORE, the parties jointly move that the deadline for the parties to conduct faceto-face settlement discussions be suspended indefinitely so that the parties can complete and adequately analyze outstanding paper discovery and to conduct depositions to prepare themselves to discuss the possibilities of settlement in this matter.

> /s/ William P. Gray, Jr. WILLIAM P. GRAY, JR. DOUGLAS N. ROBERTSON Attorneys for Plaintiff Alfa Insurance Corporation

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> /s/ J. Forrest Hinton J. FORREST HINTON W. PATTON HAHN JAMES F. BARGER, JR. Attorneys for Defendant/Third-party Plaintiff Advantage Consulting Group, Inc. and Defendant Richard E. Knutson

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